

**HIN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Re: Docket Nos. 306 & 327
	X	

**CERTIFICATION OF COUNSEL REGARDING REVISED ORDER
(A) CONDITIONALLY APPROVING THE COMBINED PLAN AND DISCLOSURE
STATEMENT FOR SOLICITATION PURPOSES ONLY, (B) ESTABLISHING
PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT
OR REJECT THE COMBINED PLAN AND DISCLOSURE STATEMENT,
(C) APPROVING THE FORMS OF BALLOTS AND SOLICITATION MATERIALS,
(D) ESTABLISHING VOTING RECORD DATE, (E) FIXING THE DATE, TIME AND
PLACE FOR THE CONFIRMATION HEARING AND THE DEADLINE FOR FILING
OBJECTIONS THERETO, AND (F) APPROVING RELATED NOTICE PROCEDURES**

The undersigned hereby certifies as follows:

1. On June 26, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Motion of Debtors for Entry of Order (A) Conditionally Approving the Combined Plan and Disclosure Statement for Solicitation Purposes Only, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, (C) Approving the Forms of Ballots and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time and Place for the Confirmation Hearing and the Deadline for Filing*

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

Objections Thereto, and (F) Approving Related Notice Procedures [Docket No. 306] (the “**Solicitation Procedures Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Solicitation Procedures Motion as **Exhibit 1** was a proposed form of order (the “**Proposed Solicitation Procedures Order**”) granting the relief requested in the Solicitation Procedures Motion.

2. On September 2, 2025, the Debtors filed the revised version of the Proposed Solicitation Procedures Order (the “**Revised Solicitation Procedures Order**”) [Docket No.327].

3. On September 3, 2025, the Court held a hearing (the “**Hearing**”) to consider, among other things, the relief requested in the Revised Solicitation Procedures Motion. At the Hearing, the Court indicated that it would enter the Revised Solicitation Procedures Order, subject to certain revisions being made consistent with the record made at the Hearing.

4. Consistent with the record made at the Hearing, the Debtors have prepared a further revised version of the Revised Solicitation Procedures Order (the “**Further Revised Solicitation Procedures Order**”), and a copy of the Further Revised Solicitation Procedures Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline comparison of the Further Revised Solicitation Procedures Order marked against the Revised Solicitation Procedures Order is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtors respectfully request that the Court enter the Further Revised Solicitation Procedures Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: September 3, 2025
Wilmington, Delaware

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